
UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

(Electronically Submitted)

SAMUEL HAWKINS EDWARDS
and BRITTANY LEIGH HUNTER

CASE NUMBER: MJ-22-04154-PCT-CDB

I, the undersigned, state under oath that the following is true and correct to the best of my knowledge and belief:

COUNT 1

On or about September 27, 2020, to October 12, 2020, in the District of Arizona, within the confines of the Grand Canyon National Park, an area within the jurisdiction of the National Park Service, the defendants, SAMUEL HAWKINS EDWARDS and BRITTANY LEIGH HUNTER, did unlawfully conduct, lead, and guide a Colorado whitewater boat trip without a permit issued by the Superintendent of the Grand Canyon National Park, in violation of 36 C.F.R. §§ 1.3 & 7.4(b)(3).

COUNT 2

On or about September 27, 2020, to October 12, 2020, in the District of Arizona, within the confines of the Grand Canyon National Park, an area within the jurisdiction of the National Park Service, the defendants, SAMUEL HAWKINS EDWARDS and BRITTANY LEIGH HUNTER, did unlawfully violate a closure order, designation, use and activity restriction and condition, and public use limit, in that the defendants entered, in violation of 36 C.F.R. §§ 1.3 & 1.5(f).

I further state that I am a US Park Ranger with the National Park Service, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT INCORPORATED HEREIN.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

REVIEWED BY: /s/ AUSA Paul V. Stearns

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

ELECTRONICALLY SUBMITTED AFFIDAVIT

Your affiant, National Park Service US Park Ranger Della Yurcik, hereby states under oath as follows:

1. Your affiant is a US Park Ranger with the National Park Service (NPS), United States Department of the Interior, and is presently assigned to the Canyon District at Grand Canyon National Park. Your affiant has been employed by the NPS since 2003 and has worked as a federal law enforcement officer in Arizona. Your affiant has received specialized training at the Federal Law Enforcement Training Center, completing the Land Management Police Training. Your affiant has extensive training and experience in investigating incidents involving resource violations.

2. The information contained in this affidavit is from your affiant's personal knowledge, as well as from information provided to your affiant by other law enforcement officers and/or witnesses including those listed herein. Because this affidavit is being submitted to establish probable cause, your affiant has not listed each item and every fact known regarding this investigation.

Introduction

3. The Grand Canyon National Park regulates the use of the Colorado River rafting trips through a permit lottery system implemented in 2006. As stated

in 36 C.F.R. § 7.4(b)(3), “No person shall conduct, lead or guide a river trip unless such person possesses a permit issued by the Superintendent, Grand Canyon National Park.”

4. River Assisted Backcountry Travel (RABT) is defined as the transient travel on the Colorado River using a portable, personal raft (typically pack rafts) for the purpose of crossing the river to access a route or trail on the other side or to travel a limited distance to gain access to a route or trail. RABT is limited to eight miles or less, and it requires a permit regardless of the duration of the trip. This is regulated through 36 C.F.R. § 1.5.

5. Use and access to all caves is prohibited without a valid permit authorized by the superintendent explicitly authorizing the use of the cave. This is regulated through 36 C.F.R. §1.5 (f), superintendent closure, and 36 C.F.R. § 1.6(g)(1), activity requiring a permit.

6. This case involves (among other violations) an illegal rafting trip on the Colorado River, as well as illegal entry into Thunder cave, which occurred in the Grand Canyon National Park, Coconino County, in the District of Arizona, on or about September 27, 2020, through October 11, 2020.

7. During this time-period, 41-year-old Samuel Hawkins Edwards (“EDWARDS”) and 41-year-old associate/girlfriend Brittany Leigh Hunter (“HUNTER”) illegally rafted from Boat Beach (RM 87) to Whitmore Wash, all within the Grand Canyon National Park in the District of Arizona. EDWARDS

completed a commercial river trip with Wilderness Raft Adventures and ended his trip at Phantom Ranch. HUNTER hiked down and met EDWARDS. Wilderness Raft Adventures refused EDWARDS' request to bring along blow-up boats. The couple navigated approximately 100 miles of the Colorado River, camped multiple nights, illegally entered Thunder River Cave, and hiked out from Whitmore Wash. The couple failed to obtain any required permits for rafting and camping. After hiking out, the couple returned to GCNP by vehicle to Tuweep on or about October 10, 2020. EDWARDS then flew a motorized aircraft to the Colorado River on October 11, 2020.

Investigation

8. On October 6, 2020, Commercial guides Gibby Simeons and Levy Jamison reported seeing an illegal pack raft trip on the Colorado River. An interview conducted by your affiant revealed that Jamison met the pack rafters at Elves Chasm River Mile 117.2 on September 28, 2020, and the couple said they were with blue boats upriver at Bass Camp and they floated ahead. The couple asked for water, which Jamison supplied. The male said he was from St. George, and the female said she was from Washington. Jamison, as an experienced guide, became suspicious of the answers given as the couple said they were taking out at Diamond Creek, and the number of days given on the river was over the allotted time for river permits. Jamison continued downriver to Blacktail Camp River Mile 120.7, and, while making lunch, he saw the couple pass by and float Blacktail Rapid. The male was

not wearing a life jacket. Jamison ran into Wilderness River Adventures at Deer Creek Falls, RM 136.8, and one of the guides told them the couple were on the upper portion of their commercial trip and were supposed to leave the river at Phantom Ranch. The guide told him the male was the owner or founder of “Squatty Potty.”

9. On October 8, 2020, Private boatman August Pirmann reported seeing an illegal pack rafting trip at Havasu Creek on September 30, 2020, where the female said it was her birthday. A shot of tequila was given to the female, who flashed her breasts as the private trip departed. The couple was described as buff and fit. The couple said they were from St. George, and they were associated with a commercial trip and had paddled ahead of their other boats. The couple said they had run the river three to four times, and the fastest way out was Whitmore Wash, “only a mile to the rim.”

10. On October 8, 2020, your affiant contacted Xanterra Phantom Assistant Manager and discovered three inbound duffels were reserved on September 27, 2020, under the name Samuel EDWARDS. Notes in the reservation said Sean is bringing the bags from Lee’s Ferry. The email address on the reservation listed showbrittany@hotmail.com and the phone number ending in 6801, which are both known (through the investigation) to be associated with HUNTER.

11. Subsequent interview and emails with Wilderness Raft Adventures Manager Sean Crane revealed that EDWARDS requested to bring blow-up boats on the commercial river trip but was denied. Crane advised that EDWARDS said he

had a permit for Phantom Ranch for one night and then was doing some river miles as part of a backcountry permit.

12. On October 12, 2020, your affiant interviewed Wilderness Raft Adventures boatman Nate Jordan. Jordan reported to your affiant that EDWARDS said he was going to meet up with a woman who had hiked in, and they were going to pack raft to Trinity and hike back to Phantom Ranch. Jordan reported to your affiant that EDWARDS had said he had been caught before on an illegal trip and that he had a permit. Jordan was aware that EDWARDS wanted to put the pack rafts on commercial trip but was denied.

13. On October 12, 2020, NPS Ranger Todd Seliga contacted your affiant about an Instagram account samedwards1217, which showed an illegal entry into Thunder River Cave and an associated illegal flight within Grand Canyon National Park in the District of Arizona. On October 11, 2020, Ranger Seliga, after receiving a report of an illegal flight, contacted EDWARDS, who was driving a GMC truck. Ranger Seliga observed a motorized paraglider in the back of a black GMC Sierra truck, Utah license plate J088S, that was found to be driven by EDWARDS. EDWARDS denied to Ranger Seliga that he (EDWARDS) flew his paraglider in the park.

14. Based on your affiant's investigation, it was learned that EDWARDS and HUNTER arrived at the Tuweep Campground, which is within the boundaries of the Grand Canyon National Park in the District of Arizona, on October 10, 2020.

They did not have a permit to camp but purchased one for seven people from volunteer Mandic-Nowac. Campers Fike and McCutcheon were camped in site 2, which was next to HUNTER and EDWARDS who were camped in site 3. Fike and McCutcheon reported that on October 11, 2020, at about 0800 hours, EDWARDS loaded a motorized paraglider into a truck bearing and drove away alone. Shortly thereafter, Fike heard the juveniles yell, “there’s dad.” Fike observed an orange and yellow motorized aircraft fly against the cliffs to the north. Fike reported that about 30 minutes later EDWARDS returned and showed she and McCutcheon a video on his cell phone of the flight he just completed. EDWARDS showed that he was close enough to the river to put his foot down into the Colorado River. EDWARDS reported to McCutcheon the video was short, as EDWARDS apparently had a hard time flying and filming at the same time. Fike and McCutcheon both mentioned that EDWARDS and HUNTER told them they went into Thunder River Cave on a recent river trip in Grand Canyon National Park.

15. On October 22, 2020, your affiant conducted an interview with Wilderness Raft Adventures Trip Leader Richard Adkins. Adkins reported that he saw EDWARDS and HUNTER paddle through Pipe Creek – which is on the Colorado River in the Grand Canyon National Park in the District of Arizona – on September 27, 2020. Adkins said EDWARDS and HUNTER were in two red Alpaca rafts. (Alpaca rafts are very distinctive based on your affiant’s training and experience.) Adkins reported that EDWARDS was not wearing a life jacket,

and EDWARDS said he was going to Trinity and then hiking out. Adkins never saw the pack rafters again but heard reports of them being seen by private river downstream. Adkins recalls speaking with boatman Jamison at Deer Creek and did talk about Squatty Potty and EDWARDS.

16. Your affiant checked the Grand Canyon River Permits database and confirmed there were no private trips with trip leaders HUNTER or EDWARDS in the River Permits Database for those dates. Your affiant checked the backcountry permit system and there were no permits reserved for the backcountry to camp in October 2020 for HUNTER or EDWARDS.

17. The investigation disclosed that persons from three different private trips that were on the river during EDWARDS and WALKER's pack rafting trip observed a male and female in red Alpaca rafts either on the river or had observed their pack rafts parked.

18. During an interview and email correspondence conducted by your affiant with private boater Sam Llobet, Llobet reported that he saw the two pack rafters, a male and a female, in red Alpaca rafts, and gave them drinking water numerous times as they said their water filter failed. Llobet saw them at Havasu and realized they were poaching, as their statements were so vague. Llobet commented about how hard it is to get a river permit, and he said that these two were just doing as they pleased.

19. During an interview and email correspondence conducted by your affiant with Ben Williamson, a private river trip boatman, he reported that he saw two pack rafters run Dubendorf Rapid, River Mile 132, and gave them water. The couple claimed they could run up to eight miles unpermitted. Williamson reported the couple camped at Tapeats Creek, River Mile 133.7, where they left their pack rafts and hiked up to explore Thunder Falls on or around September 29, 2020. Williamson reported he camped at River mile 137.5 and saw the pack rafters pass by late in the evening. On September 30, 2020, Williamson saw the pack rafts on the rocks at Havasu Creek, river mile 157.5. The couple passed by again at Tuck Up Drainage, River Mile 168, and he gave them water. The couple was described as bald male with a wet suit and no life jacket, and a stocky female with short curly hair and a commercial PFD with an orange flap. The pack rafts were red. (These description match EDWARDS and HUNTER.)

20. On November 19, 2020, private boater Ben Cunnyngnam emailed your affiant a photo of the pack rafters taken near Bass Rapids, which is on the Colorado River in the Grand Canyon National Park. The photo shows EDWARDS and HUNTER, who are recognizable in the photo.

21. Further investigation by your affiant led to preservation requests and search warrants for Instagram accounts samedwards1217, become_by_brittany and Brittany_become – accounts associated with EDWARDS and HUNTER.

22. Photos and videos were obtained via search warrant from the Instagram accounts samedwards1217, become_by_brittany, and Brittany_become. This included videos of HUNTER and EDWARDS inside Thunder River Cave; a photo of Thunder River Cave circled; a post by HUNTER saying, “this is where we went in”; a photo of HUNTER with the date Sep 30, 2020 and “Exactly where I need to be for my Birthday” in Tapeats Creek; a photo of HUNTER near the entrance of Thunder River Cave; a picture from the mouth of Thunder River Cave by EDWARDS with the caption, “Ever hiked to a spring that comes gushing out of the side of a mountain then climb inside a half mile and swim in underground caverns and waterfalls!!!” A comment on the post by HUNTER stated, “I have now.”

23. On July 27, 2021, Rangers Seliga and Yurcik attempt an interview with HUNTER at her residence in Washington UT; however, the rangers were turned away as she was reportedly busy with her kids.

24. On July 28, 2021, HUNTER participated in a phone interview with your affiant where she admitted to floating on the Colorado River but denied camping and said they hiked out every night. HUNTER said she could not recall where she took out. HUNTER said they got water from lots of people who were on other river trips, that she planned the trip with Sam (EDWARDS), and they attempted to go into a cave but did not get in too far. When asked, HUNTER denied seeing EDWARDS flying the motorized aircraft at Tuweep. While subsequently texting with HUNTER about another interview, HUNTER sent the following text to your affiant when

attempting to set up a phone call: “Ha ha we shall see. I hate feeling guilty over something so incredible that I did. But I did just text them to set up a time. You motivated me. Thank you.” Your affiant believes that HUNTER inadvertently sent this text to your affiant. However, when asked, HUNTER said she knew she was sending the text to your affiant (LEO Yurcik).

25. Your affiant performed additional investigation into EDWARDS’ background within National Park Service sites and determined that he had previously been investigated for and/or charged with violations in Zion National Park, Cedar Breaks National Monument, the Glen Canyon National Recreation Area, and the Grand Canyon National Park. EDWARDS was also convicted on October 3, 2019, for illegally rafting and camping in the Grand Canyon National Park in Case No. 19-04218MJ-001-PCT-CDB.

Conclusion

26. Based on the foregoing, your affiant respectfully submits that there is probable cause to support that SAM HAWKINS EDWARDS and BRITTANY LEIGH HUNTER violated federal law. *See* 36 C.F.R. §§ 1.3, 1.5(f), & 7.4(b)(3).

/////

27. Your affiant is respectfully seeking arrest warrants for EDWARDS and HUNTER.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

05/19/2022
Date

Della Yurcik
Della Yurcik
US Park Ranger, NPS

 X Sworn by Telephone

Date/Time

Camille
D. Bibles

Digitally signed by
Camille D. Bibles
Date: 2022.05.19
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Camille D. Bibles
United States Magistrate Judge